

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**IQVIA, INC. and IMS SOFTWARE
SERVICES, LTD,**

Plaintiffs/ Counterclaim Defendants,

vs.

VEEVA SYSTEMS, INC.,

Defendant/ Counterclaim Plaintiff.

Case No.: 2:17-CV-00177-CCC-MF

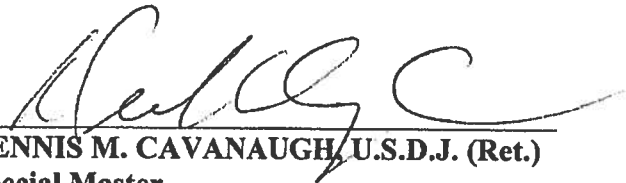
ORDER OF THE SPECIAL MASTER

This matter coming before the Special Master on various Motions filed by Plaintiffs-Counterclaim Defendants IQVIA, Inc. and IMS Software Services, LTD, (collectively "IQVIA") and Defendant-Counterclaim Plaintiff Veeva Systems, Inc. ("Veeva"), it is on this 28th day of March, 2018, **ORDERED THAT:**

1. Veeva's request that the Court Order IQVIA to respond to Veeva's Interrogatory No. 14 by providing detailed, numbered, claim-by-claim identification of each of IQVIA's separate trade secret claims at issue in this lawsuit is **DENIED without prejudice;**
2. Veeva's request that the Court Order IQVIA to provide complete, detailed responses to Veeva's Interrogatories Nos. 15, 17, 18, 19, 20, 21, 22, 23, 25 and 28 is **DENIED;**
3. IQVIA's request that the Special Master compel the production of Veeva's responses to IQVIA Requests Nos. 1-14, 109-110 & 112 is **GRANTED;**
4. IQVIA's request that the Special Master compel the production of Veeva's responses to IQVIA Request No. 21 is **GRANTED;**
5. IQVIA's request that the Special Master compel the production of Veeva's responses to IQVIA Requests Nos. 27-33, 89-100 is **GRANTED;**

6. IQVIA's request that the Special Master compel the production of Veeva's responses to IQVIA Requests Nos. 85-86, 88 is **GRANTED**;
7. IQVIA's request that the Special Master compel the production of Veeva's responses to IQVIA Requests Nos. 38-42 is **GRANTED**;
8. IQVIA's request that the Special Master compel the production of Veeva's responses to IQVIA Requests Nos. 43-44, 46-47 is **GRANTED**;
9. IQVIA's request that the Special Master compel the production of Veeva's responses to IQVIA Requests Nos. 45, 48, 50-52, 61-62 is **GRANTED**;
10. IQVIA's request that the Special Master compel the production of Veeva's responses to IQVIA Requests Nos. 34 & 52 and Interrogatories 1-9, 11, 13-14 is **GRANTED**;
11. IQVIA's request that the Special Master compel the production of Veeva's responses to IQVIA Requests Nos. 37, 48, 53-55 is **GRANTED**;
12. IQVIA's request that the Special Master compel the production of Veeva's responses to IQVIA Requests Nos. 56, 57-59 is **GRANTED**;
13. Veeva's request that the Court Order IQVIA to provide complete, detailed responses to Veeva's Interrogatories Nos. 26 and 27 is **DENIED**;
14. IQVIA is ordered to respond to Veeva's discovery requests, Veeva Requests Nos. 18-41, 60, 64, 66, 83-84, 86, 99, 104-106, 112-113, 243-252, and Veeva Interrogatory Nos. 1-5, by producing relevant documents related to the United States and global or geographic areas including the United States; Following this production, the parties shall meet and confer to determine whether documents from additional geographic regions should be produced;
15. Veeva's request that the Court Order IQVIA to produce relevant documents and communications relating to Veeva's Interrogatory No. 7 and Requests Nos. 84, 86, 88, 94, and 95 is **GRANTED**;
16. Veeva's request that the Court Order IQVIA to produce documents responsive to Veeva's Requests for Documents Nos. 12-14 is **DENIED**;
17. IQVIA and Veeva shall respond to discovery concurrently;

18. The parties shall provide responses to the above ordered Interrogatory and Document requests within thirty (30) days of the date of this Order;
19. Fact discovery is to remain open through September 1, 2018. No discovery is to be issued or engaged in beyond that date, except upon application and for good cause shown;
20. The parties shall submit a deposition schedule to the Special Master by April 30, 2018;
21. Depositions of fact witnesses shall be completed by September 1, 2018;
22. All affirmative expert reports shall be delivered by October 1, 2018. Any such report is to be in the form and content as required by Rule 26;
23. All responding expert reports shall be delivered by October 15, 2018. Any such report is to be in the form and content as required by Rule 26;
24. All expert discovery shall be completed by November 15, 2018;
25. Any discovery dispute shall be brought to the Special Master's attention by correspondence after the parties' good faith attempt to resolve the dispute has failed. No discovery motion shall be made without leave of the Special Master;
26. Counsel are to attend a status conference before the Special Master at 10:00am on Wednesday May 2, 2018, at the offices of Kelley Drye & Warren LLP in Parsippany, New Jersey;
27. Any appeal of or objections to the findings or conclusions of the Special Mater must be filed within the time frame set forth in Local Civil Rule 72.1(c)(1). Any appeals or objections will be addressed to the Honorable Claire C. Cecchi, U.S.D.J.


DENNIS M. CAVANAUGH, U.S.D.J. (Ret.)
Special Master